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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	Chapter 11
	:	
LTL MANAGEMENT LLC,	:	Case No. 21-30589
	:	
Debtor.	:	
	:	

**DECLARATION OF JOSEPH D. SATTERLEY**

Pursuant to 28 U.S.C. § 1746, I, Joseph D. Satterley, declare under penalty of perjury as follows:

1. I am a partner in the law firm of Kazan, McClain, Satterley & Greenwood, A Professional Law Corporation, located at 55 Harrison Street, Suite 400, Oakland, California 94607, and have been duly admitted to practice law in the States of Pennsylvania, Kentucky, and California, the United States Supreme Court, the U.S. District Court for the Eastern and Western Districts of Kentucky, and the U.S. Court of Appeals for the Third, Sixth, Eighth, and Ninth Circuits. I am admitted as counsel *pro hac vice* in this action for Kristie Lynn Doyle. She is an active member of the Talc Claimant Committee.

2. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein. If called as a witness, I would testify as to those facts.

3. I submit this Declaration in support of Ms. Doyle's reply to Debtor LTL Management LLC's ("Debtor") response [Dkt. 2631] to claimants' objection to continuing the Preliminary Injunction entered in this matter [Dkt. 1635] (the "PI Order") against non-debtor Johnson & Johnson ("J&J").

4. I am the partner in charge of all aspects of Ms. Doyle's case. I am also the lead trial lawyer in her case. As a result, I have personal knowledge of the case's procedural posture and management.

5. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint for Personal Injuries and Loss of Consortium in the *Doyle* matter, filed on August 27, 2018, in the Superior Court of California, County of Santa Clara ("State Court").

6. On November 14, 2018, the State Court granted the motion for preference of Ms. Doyle and her husband and set the case for trial on March 4, 2019.

7. On December 27, 2018, Mr. Doyle died from mesothelioma. As a result, the trial date was vacated.

8. On March 8, 2019, the State Court granted Ms. Doyle's motion to file an amended complaint naming her and her son, Ethan Doyle, as plaintiffs and alleging claims for survivorship and wrongful death against J&J. Attached hereto as **Exhibit B** is a true and correct copy of the First Amended Complaint for Personal Injuries (Survivorship) and Wrongful Death.

9. On August 9, 2019, the State Court set a jury trial for May 11, 2020. However, because of the COVID-19 pandemic, the State Court vacated all civil jury trials, including the *Doyle* matter.

10. On April 6, 2021, the *Doyle* matter was set for trial on September 7, 2021.

11. Fact discovery closed and was completed on or around July 9, 2021.

12. Expert depositions were completed. Except for J&J's review of certain SEM stubs in Plaintiffs' possession, all expert discovery has been completed.

13. On August 27, 2021, the parties appeared before Judge Sunil Kulkarni in State Court for a Mandatory Settlement Conference. The parties were unable to resolve the matter.

14. During late August and early September 2021, the parties filed and served their motions in limine and oppositions thereto, as well as page-and-line designations.

15. On October 26, 2021, J&J and Debtor filed their Notice of Bankruptcy Filing and Reservation of Rights in State Court. As a result, the trial date was vacated.

16. On November 2, 2021, the State Court held a trial-setting conference to discuss how this bankruptcy case affects Plaintiffs' claims against J&J. After considering the parties' arguments, the State Court set the *Doyle* matter for a jury trial on April 11, 2022.

17. On April 15, 2022, Judge Amber Rosen was assigned to try the *Doyle* matter. After learning that this Court will revisit the PI Order on June 29, 2022, Judge Rosen vacated the trial date and set a Status Conference on July 14, 2022.

18. Attached hereto as **Exhibit C** is a true and correct copy of the Reporter's Transcript of Proceedings in the *Doyle* matter, taken on July 14, 2022.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. I executed this Declaration on July 19, 2022, in Oakland, California.

By: /s/ Joseph D. Satterley  
JOSEPH D. SATTERLEY